

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Crim. No.: 1:23-CR-000121 (AJT)
	:	
HADJA FRANKLIN, <i>et al.</i>	:	
	:	
Defendants.	:	
_____	:	

DEFENDANT HADJA FRANKLIN'S MOTION TO SUBSTITUTE COUNSEL

COMES NOW Defendant Hadja Franklin and her counsel, Todd S. Baldwin, Esq., and moves to withdraw from further representing Ms. Franklin in this case, and in the Fourth Circuit Court of Appeals. In support thereof, Ms. Franklin and her counsel state as follows:

1. On March 5, 2024, Defendant Hadja Franklin, along with her two (2) Co-Defendants, pled guilty of conspiring to distribute forty (40) grams or more of fentanyl, in violation of *21 U.S.C §§ 841(a)(1) and 846*.
2. On June 5, 2024, Ms. Franklin was sentenced to 66 months of imprisonment, four years of supervised release, with other terms and conditions imposed.
3. Subsequent to her sentence, Ms. Franklin has expressed her wishes to appeal her conviction and her sentence.
4. Counsel advised Ms. Franklin of her waiver of appeal under the Plea Agreement, except on the grounds of ineffective assistance of counsel, *28 U.S.C § 2255*.
5. Ms. Franklin has instructed the undersigned counsel to file the Notice of Appeal to appeal her conviction and sentence.

6. Beyond filing the Notice of Appeal on Ms. Franklins's behalf, the circumstances between Ms. Franklin and the undersigned presents a conflict of interest that cannot be waived.

Va. R. Prof. Conduct. § 1.7.

7. The government does not oppose this motion.

8. Ms. Franklin further requests that the Court rule on this motion without a hearing on the matter.

WHEREFORE, Defendant Hadja Franklin and Todd S. Baldwin, Esq. respectfully requests that the Court appoint Ms. Franklin substitute counsel in this Court, and for her appeal to the Fourth Circuit Court of Appeal.

Respectfully submitted,

HADJA FRANKLIN, and
TODD S. BALDWIN, ESQ.,

By Counsel,

/s/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 18th day of June, 2024 caused a copy of the foregoing *Defendant Hadja Franklin's Motion to Substitute Counsel* to be served on the parties in this case by electronically filing the foregoing with the Clerk of the Court using CM/ECF System, which will send notice of such filing to the following registered CM/ECF user(s):

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